# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF IOWA EASTERN (DUBUQUE) DIVISION

UNITED STATES OF AMERICA,	)
Plaintiff,	) No. 19-CR-1050-CJW
vs.	)
GINA CHRISTA URBAIN,	)
Defendant.	)

## **GOVERNMENT'S SENTENCING MEMORANDUM**

In advance of the sentencing currently set for February 12, 2021, the United States hereby provides its sentencing memorandum.

### A. Government Witnesses

None.<sup>1</sup>

### B. Government Exhibits

None.

### C. Sentencing Issues

The Presentence Report indicates that there is one issue for the Court to resolve at sentencing: the defendant's ability to pay a fine and the imposition of the \$5,000 special assessment.

The parties have reached a plea agreement Pursuant to Rule 11(c)(1)(C) of the Federal Rules of Criminal Procedure, the parties stipulated to a sentence of 360 months' imprisonment. Attached is a brief regarding the sole contested issue.

<sup>&</sup>lt;sup>1</sup> The government anticipates that at least one victim wishes to address the Court at sentencing.

#### CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2021, I electronically filed the foregoing with the Clerk of Court using the ECF system, which will send notification of such filing to the parties or attorneys of record.

UNITED STATES ATTORNEY

BY: <u>/s/ RAL</u>

Respectfully submitted,

PETER E. DEEGAN, JR. United States Attorney

By: /s/ Emily K. Nydle

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